

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jermaine Cooper,

Plaintiff,

-against-

City of New York, *et al.*,

Defendants.

NOTICE OF MOTION

24 CV 7986 (NRB)

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law and Declaration of Gabriel P. Harvis dated November 14, 2024, and supporting exhibits, and upon all the prior pleadings and proceedings herein, plaintiff, by and through his attorneys, hereby moves this Honorable Court, at the United States District Court for the Southern District of New York, for an order remanding this action to the New York County Supreme Court on the grounds that it was improperly removed without consent, and granting plaintiff leave to file a post-remand motion for costs pursuant to 28 U.S.C. § 1447(c).

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b)(2) opposing or response papers, if any, must be served with 14 days.

Dated: November 14, 2024
Briarcliff Manor, New York

ELEFTERAKIS, ELEFTERAKIS & PANEK



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To: Defense Counsel (by ECF)